Spill Prevention Control & Countermeasure Program (SPCC)

- Purpose is to prevent discharges of oil into navigable waters of the US.
- This is accomplished through:
 - Tank Integrity constructed and tested in accordance with industry standards (API)
 - Secondary Containment
 - Volume to contain the capacity of the largest tank plus precipitation
 - Must be able to contain the oil until cleanup occurs
 - This is verified and Certified by a Professional Engineer
 - Training of staff in oil handling and spill prevention standards
 - o Self-inspection on a quarterly to annual basis depending on the product
- Notification Requirements
 - Facility Response Coordinator
 - National Response Center
 - Cleanup Contractors
 - Federal, State and Local Agencies (including the LEPC)

Federal Response Plan (FRP)

- Applicable to High Risk oil storage facilities.
- Purpose is to demonstrate a facility's preparedness to respond to a worst-case oil discharge.
- FRP requires to prepare and submit an FRP, which addresses:
 - Consistency with the National Contingency Plan and applicable Area Contingency Plans;
 - o Identify a Qualified Individual (have full authority to implement removal),
 - Immediate communication with federal authorities and responders;
 - Identify and ensure availability of resources to remove, to the maximum extent practicable, a worst-case discharge - ITC has an Oil Spill Removal Organization (OSRO) under Contract
 - Training, testing, exercises unannounced drills, and response actions of persons at the facility;
 - Be updated periodically;
 - Be resubmitted to an EPA Regional Office for approval of each significant change.

1 4/3/2019